

**IN THE UNITED STATES DISTRICT COURT
for the
Southern District of Texas
Houston Division**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 4:12-CR-00503
)	
v.)	
)	
JASON DANIEL GANDY,)	
)	
Defendant.)	

**DEFENDANT’S MOTION FOR DESIGNATION OF GOVERNMENT EXPERTS AND
THEIR REPORTS**

TO THE HONORABLE LEE ROSENTHAL, CHIEF DISTRICT JUDGE FOR THE
SOUTHERN DISTRICT OF TEXAS:

The Defendant, JASON DANIEL GANDY, in the above-styled and numbered cause, by and through the undersigned counsel, and respectfully moves this Court to order the prosecution to designate any and all experts who will be called to testify, and any and all reports that such experts have produced on or before January 22, 2018.

In support, Defendant would show:

1) Early designation of those experts, the topics they are expected to testify to, and their reports is necessary to allow the Defendant adequate time to determine what items of evidence Defense experts may need to examine to be able to rebut, if necessary, the expected testimony of government experts.

WHEREFORE, Defendant respectfully asks this Honorable Court to GRANT his motion in all respects.

Respectfully submitted,

GRECO ♦ NEYLAND, PC

/s/ Dustan Neyland
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CERTIFICATE OF CONFERENCE

On January 3, 2018, counsel for Defendant conferred with AUSA Sherri Zack concerning her position regarding the above motion, and she has advised me that he will respond and state her position with respect to this motion by filing responsive pleading.

/s/ Dustan Neyland
DUSTAN NEYLAND

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to AUSA Sherri Zack .

/s/ Dustan Neyland
DUSTAN NEYLAND